

The JS 44 civil cover sheet and the information contained herein are to be used in neither replacement of the filing and service of process or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON PAGE TWO OF THE FORM.)

I. (a) PLAINTIFFS Gregory Jones and Darlene Jones, as successors in interest to Eric Jones; Gregory Jones, an individual; and Darlene Jones, an individual	DEFENDANTS County of Del Norte, California, a political subdivision of the State of California; Ramsay Williamson, an individual; and Does 1 through 10
(b) County of Residence of First Listed Plaintiff Curry County, Oregon (EXCEPT IN U.S. PLAINTIFF CASES)	County of Residence of First Listed Defendant Del Norte, California (IN U.S. PLAINTIFF CASES ONLY) NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.
(c) Attorney's (Firm Name, Address, and Telephone Number) Eric R. Maier Maier Shoch LLP 633 W. Fifth St., Ste. 5880, Los Angeles, CA 90071 (213) 489-4778	Attorneys (If Known) <div style="text-align: center;"> </div>

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)	III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)																				
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IV. NATURE OF SUIT (Place an "X" in One Box Only)					
CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input checked="" type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition			

V. ORIGIN (Place an "X" in One Box Only)						
<input checked="" type="checkbox"/> 1 Original Proceeding	<input type="checkbox"/> 2 Removed from State Court	<input type="checkbox"/> 3 Remanded from Appellate Court	<input type="checkbox"/> 4 Reinstated or Reopened	Transferred from another district (specify)	<input type="checkbox"/> 6 Multidistrict Litigation	<input type="checkbox"/> 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION	Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 42 U.S.C. § 1983 Brief description of cause: Excessive and unreasonable deadly police force in violation of Fourth and Fourteenth Amendment
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VII. REQUESTED IN COMPLAINT:	<input type="checkbox"/> CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23	DEMAND \$ 20,000.00	CHECK YES only if demanded in complaint: JURY DEMAND: <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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VIII. RELATED CASE(S) IF ANY	PLEASE REFER TO CIVIL L.R. 3-12 CONCERNING REQUIREMENT TO FILE "NOTICE OF RELATED CASE"
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IX. DIVISIONAL ASSIGNMENT (CIVIL L.R. 3-2) (PLACE AND "X" IN ONE BOX ONLY)	<input checked="" type="checkbox"/> SAN FRANCISCO/OAKLAND	<input type="checkbox"/> SAN JOSE
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DATE July 2, 2008	SIGNATURE OF ATTORNEY OF RECORD
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ORIGINAL**E-filing****FILED**

JUL - 3 2008

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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Attorneys for Plaintiffs
 GREGORY JONES and DARLENE JONES

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

BZ

GREGORY JONES and DARLENE JONES, as
 successors in interest to Eric Jones; GREGORY
 JONES, an individual; and DARLENE JONES,
 an individual,

Plaintiffs,

v.

COUNTY OF DEL NORTE, CALIFORNIA, a
 political subdivision of the State of California;
 RAMSAY WILLIAMSON, an individual; and
 DOES 1 through 10 inclusive,

Defendants.

Case No.: 08

3222

**COMPLAINT FOR VIOLATION OF CIVIL
 RIGHTS (42 U.S.C. § 1983); ASSAULT AND
 BATTERY; NEGLIGENCE; NEGLIGENT
 TRAINING AND SUPERVISION;
 WRONGFUL DEATH**

DEMAND FOR JURY TRIAL

1 Plaintiffs Gregory Jones and Darlene Jones, in their individual capacities and also in their
2 capacities as successors in interest to Eric Jones, for their complaint against defendants County of Del
3 Norte and Ramsay Williamson, hereby allege as follows:

4 5 **INTRODUCTION**

6 1. On May 16, 2008, Eric Jones was driving home to Brookings, Oregon after visiting
7 his sister in Medford, Oregon, a trip he had made on countless prior occasions. While driving in Del
8 Norte County, California as part of his customary route, Eric was pulled over by members of the Del
9 Norte County Sheriff's Department, allegedly for reckless driving. Eric exited his vehicle at the
10 instruction of the deputies, and made clear to the deputies that he was not armed. Seconds later,
11 Deputy Ramsey Williamson fired two bullets at Eric's dog, which had exited the vehicle. Then, after
12 Deputy Williamson disabled Eric's dog, he fired a bullet at Eric, hitting Eric in the abdomen and
13 disabling him. After disabling Eric with his first shot, Deputy Williamson fired a second shot at Eric,
14 which entered Eric's chest and pierced his lung. Eric Jones, an unarmed motorist alleged to have
15 done nothing more than reckless driving on the way home from a visit with his sister, was killed.

16 17 **JURISDICTION AND VENUE**

18 2. This action, filed to redress the violation of Eric Jones' rights under the Fourth
19 Amendment and Fourteenth Amendment to the United States Constitution, arises under the Civil
20 Rights Act of 1871, 42 U.S.C. § 1983.

21 3. This Court has jurisdiction of this case pursuant to 28 U.S.C. § 1331, 28 U.S.C.
22 § 1343, and 28 U.S.C. § 1367.

23 4. Venue is proper in this district under 28 U.S.C. § 1331(b) because the defendants
24 reside in this district, and because a substantial part of the events or omissions giving rise to the claim
25 occurred in this district.

PARTIES

5. Plaintiff Gregory Jones is the father of Eric Jones. Greg Jones brings this action in his individual capacity, and also in his capacity as a successor in interest to Eric Jones. Greg Jones is a resident of Brookings, Oregon.

6. Plaintiff Darlene Jones is the mother of Eric Jones. Darlene Jones brings this action in her individual capacity, and also in her capacity as a successor in interest to Eric Jones. Darlene Jones is a resident of Brookings, Oregon.

7. At all relevant times, defendant Ramsay Williamson was employed as a Deputy Sheriff by the County of Del Norte. Defendant Ramsay Williamson was acting within the course and scope of his employment as a Deputy Del Norte County Sheriff when he engaged in each of the acts alleged in this complaint. On information and belief, Ramsay Williamson is a resident of Del Norte County, California.

8. Defendant County of Del Norte is a political subdivision of the State of California. At all relevant times, the Del Norte County Sheriff's Department was a department or agency of the County of Del Norte. At all relevant times, the County of Del Norte was the employer of defendant Ramsay Williamson.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

9. On June 16, 2008, pursuant to section 910 of the California Government Code, plaintiffs Greg Jones and Darlene Jones filed claims for damages with the Board of Supervisors of the County of Del Norte to redress damages incurred by the conduct alleged in this complaint.

10. On June 18, 2008, the County of Del Norte notified plaintiffs Greg Jones and Darlene Jones that it has rejected the claims that they filed on June 16, 2008.

ALLEGATIONS COMMON TO ALL CAUSES OF ACTION

11. On May 16, 2008, Eric Jones was driving home to Brookings, Oregon from Medford, Oregon after visiting his sister in Medford. He was traveling with his two dogs. The route from Medford to Brookings along the Redwood Highway dips below the Oregon-California border and goes through Del Norte County.

12. While Eric drove through Del Norte County, members of the California Highway Patrol began pursuing Eric's vehicle, allegedly to investigate a complaint concerning reckless driving. At some point before Eric's car reached the Hiouchi Bridge, the tires on his vehicle were disabled by a spike strip deployed by the California Highway Patrol. Eric came to a stop at the side of the Hiouchi Bridge, where members of the Del Norte County Sheriff's Department were waiting for him.

13. After Eric stopped his vehicle on the side of the Hiouchi Bridge, members of the Del Norte Sheriff's Department ordered Eric to exit the vehicle and to make clear that he had no weapon in his hands. Eric complied with these orders, exiting his vehicle and demonstrating that he was not carrying any weapons.

14. While Eric was outside of his vehicle complying with sheriff deputies' orders, one of his dogs ran out of Eric's vehicle. Deputy Williamson fired two shots at the dog, disabling the dog.

15. After Deputy Williamson disabled the dog that ran out of Eric's vehicle, he fired a shot at Eric. Deputy Williamson's first shot at Eric hit Eric in the abdomen, incapacitating Eric but not killing him. Deputy Williamson then fired a second shot at Eric, hitting him through the chest, piercing his lung, and ultimately killing him.

16. At the time that Deputy Williamson fired his weapon at Eric, he knew that: (1) Eric was unarmed; (2) Eric was not suspected to have committed a violent felony; (3) the dog that had exited Eric's vehicle had been shot twice and was incapacitated if not dead; (4) Eric was not close enough to Deputy Williamson to strike him and did not provide any indication that he intended to do so; and (5) Eric's vehicle had been disabled by the spike strip.

1 17. At the time that Deputy Williamson fired his first shot at Eric, he had no reason to
2 believe that the use of deadly force against Eric was necessary to protect Deputy Williamson or
3 anybody else from an imminent threat of great bodily harm or death.

4 18. At the time that Deputy Williamson fired his second shot at Eric, he had no reason to
5 believe that the use of deadly force against Eric was necessary to protect Deputy Williamson or
6 anybody else from an imminent threat of great bodily harm or death. Deputy Williamson's only
7 purpose for firing a second shot was to kill Eric because he had already wounded him. In doing so,
8 Deputy Williamson was acting in accordance with the training and instruction he received from the
9 Del Norte County Sheriff's Department.

10 19. Deputy Williamson's unreasonable use of deadly force constitutes a violation of Eric's
11 rights under the Fourth and Fourteenth Amendments to the United States Constitution. Deputy
12 Williamson's conduct also deprived Eric of his right to life, and caused Eric to incur significant pain
13 and suffering prior to his death. Eric also incurred medical, funeral, and burial expenses as a result of
14 Deputy Williamson's conduct.

15 20. Greg Jones and Darlene Jones have suffered, and will continue to suffer, significant
16 damages as a result of Deputy Williamson's killing of Eric Jones. These damages are for, among
17 other things, loss of support, loss of companionship, loss of care, loss of society, and loss of earnings.

18 21. Deputy Williamson's conduct was malicious, wanton, oppressive, and accomplished
19 with a conscious disregard for the rights of Eric Jones, warranting an award of punitive damages.

20 21 FIRST CAUSE OF ACTION

22 **Against Ramsay Williamson For Violation Of Civil Rights, 42 U.S.C. § 1983**

23 **(By Plaintiffs As Successors In Interest To Eric Jones)**

24 22. Plaintiffs reallege and incorporate paragraphs 1 through 21 as though fully set forth
25 herein.

26 23. Defendant Ramsay Williamson, while working as a Sheriff's Deputy for the County of
27 Del Norte Sheriff's Department, and acting within the course and scope of his duties, used lethal
28 force against Eric Jones without legal justification and without a reasonable belief that the use of

1 deadly force was necessary to protect Deputy Williamson or anybody else from an imminent risk of
2 great bodily harm or death.

3 24. Defendant Ramsay Williamson's use of lethal force against Eric Jones violated Eric
4 Jones' rights under the Fourth Amendment and Fourteenth Amendment of the United States
5 Constitution.

6 25. As a result of Defendant Ramsay Williamson's illegal and unjustified shooting of Eric
7 Jones, which constituted a violation of Eric Jones' rights under the Fourth Amendment and
8 Fourteenth Amendment of the United States Constitution, Eric Jones incurred medical expenses,
9 burial expenses, and funeral expenses.

10 26. As a result of Defendant Ramsay Williamson's illegal and unjustified shooting of Eric
11 Jones, which constituted a violation of Eric Jones' rights under the Fourth Amendment and
12 Fourteenth Amendment of the United States Constitution, Eric Jones incurred great pain and
13 suffering prior to his death.

14 27. As a result of Defendant Ramsay Williamson's illegal and unjustified shooting of Eric
15 Jones, which constituted a violation of Eric Jones' rights under the Fourth Amendment and
16 Fourteenth Amendment of the United States Constitution, Eric Jones lost his life.

17 28. Deputy Williamson's conduct was malicious, wanton, oppressive, and accomplished
18 with a conscious disregard for the rights of Eric Jones, entitling Plaintiffs, as administrators of the
19 Estate of Eric Jones, to an award of exemplary and punitive damages.

20
21 **SECOND CAUSE OF ACTION**

22 **Against County of Del Norte For Violation Of Civil Rights, 42 U.S.C. § 1983**

23 **(By Plaintiffs As Successors In Interest To Eric Jones)**

24 29. Plaintiffs reallege and incorporate paragraphs 1 through 28 as though fully set forth
25 herein.

26 30. The conduct of Deputy Williamson, which deprived Eric Jones of his rights under the
27 Fourth Amendment and Fourteenth Amendment of the United States Constitution, was the result of a
28 longstanding practice or custom which constitutes the standard operating procedure of Del Norte

County. Deputy Williamson was acting pursuant to his training, instruction, and departmental policy when he fired his weapon at Eric Jones without having an objectively reasonable belief that the use of deadly force against Eric Jones was necessary to protect himself or another from an imminent threat of great bodily harm or death. Deputy Williams also was acting pursuant to his training, instruction, and departmental policy when he fired a second shot at Eric Jones in order to kill him after he already had wounded him with his previous shot.

31. As a result of Defendant Ramsay Williamson's illegal and unjustified shooting of Eric Jones, which constituted a violation of Eric Jones' rights under the Fourth Amendment and Fourteenth Amendment of the United States Constitution, and was done pursuant to Deputy Williamson's training, instruction, and departmental policy, Eric Jones incurred medical expenses, burial expenses, and funeral expenses.

32. As a result of Defendant Ramsay Williamson's illegal and unjustified shooting of Eric Jones, which constituted a violation of Eric Jones' rights under the Fourth Amendment and Fourteenth Amendment of the United States Constitution, and was done pursuant to Deputy Williamson's training, instruction, and departmental policy, Eric Jones incurred great pain and suffering prior to his death.

33. As a result of Defendant Ramsay Williamson's illegal and unjustified shooting of Eric Jones, which constituted a violation of Eric Jones' rights under the Fourth Amendment and Fourteenth Amendment of the United States Constitution, and was done pursuant to Deputy Williamson's training, instruction, and departmental policy, Eric Jones lost his life.

THIRD CAUSE OF ACTION

Against All Defendants For Assault And Battery

(By Plaintiffs As Successors In Interest To Eric Jones)

34. Plaintiffs reallege and incorporate paragraphs 1 through 33 as though fully set forth herein.

35. Defendant Ramsay Williamson, while working as a Sheriff's Deputy for the County of Del Norte Sheriff's Department, and acting within the course and scope of his duties, intentionally

1 fired two bullets at Eric Jones. The first bullet struck Eric Jones in the abdomen, injuring and
2 incapacitating him. Then, while Eric Jones was injured and incapacitated, Defendant Ramsay
3 Williamson fired a second bullet at Eric Jones, killing him.

4 36. The first bullet that Deputy Williamson fired at Eric Jones resulted in severe injury to
5 Eric Jones. The second bullet that Deputy Williamson fired at Eric Jones resulted in further injury
6 and, ultimately, death.

7 37. Deputy Williamson had no legal justification for firing his weapon at Eric Jones, and
8 Deputy Williamson's use of force against Eric Jones while carrying out his police duties was an
9 unreasonable use of force.

10 38. As a result of Defendant Ramsay Williamson's illegal and unjustified shooting of Eric
11 Jones, Eric Jones incurred medical expenses, burial expenses, and funeral expenses.

12 39. As a result of Defendant Ramsay Williamson's illegal and unjustified shooting of Eric
13 Jones, Eric Jones incurred great pain and suffering prior to his death.

14 40. As a result of Defendant Ramsay Williamson's illegal and unjustified shooting of Eric
15 Jones, Eric Jones lost his life.

16 41. Deputy Williamson's conduct was malicious, wanton, oppressive, and accomplished
17 with a conscious disregard for the rights of Eric Jones, entitling Plaintiffs, as administrators of the
18 Estate of Eric Jones, to an award of exemplary and punitive damages.

19
20 **FOURTH CAUSE OF ACTION**

21 **Against All Defendants For Negligence**

22 **(By Plaintiffs As Successors In Interest To Eric Jones)**

23 42. Plaintiffs reallege and incorporate paragraphs 1 through 41 as though fully set forth
24 herein.

25 43. A police officer has a duty to use reasonable care in employing deadly force.

26 44. Defendant Ramsay Williamson, while working as a Sheriff's Deputy for the County of
27 Del Norte Sheriff's Department, failed to use reasonable care in employing deadly force against Eric
28 Jones.

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52. As a consequence of defendant County of Del Norte's failure to use reasonable care in training and supervision Deputy Ramsay Williamson, Deputy Williamson shot Eric Jones twice without legal justification or reason. The first bullet struck Eric Jones in the abdomen, injuring and incapacitating him. Then, while Eric Jones was injured and incapacitated, Deputy Williamson fired a second bullet at Eric Jones, killing him.

53. As a consequence of defendant County of Del Norte's failure to use reasonable care in training and supervision Deputy Ramsay Williamson, Eric Jones incurred medical expenses, burial expenses, and funeral expenses.

54. As a consequence of defendant County of Del Norte's failure to use reasonable care in training and supervision Deputy Ramsay Williamson, Eric Jones incurred great pain and suffering prior to his death.

55. As a As a consequence of defendant County of Del Norte's failure to use reasonable care in training and supervision Deputy Ramsay Williamson, Eric Jones lost his life.

SIXTH CAUSE OF ACTION

Against All Defendants For Wrongful Death

(By Greg Jones and Darlene Jones In Their Individual Capacities)

56. Plaintiffs reallege and incorporate paragraphs 1 through 55 as though fully set forth herein.

57. Greg Jones is the father of Eric Jones.

58. Darlene Jones is the mother of Eric Jones.

59. The defendants' wrongful conduct, as alleged above, caused the death of Eric Jones.

60. As a result of defendants' wrongful conduct, which caused the death of Eric Jones, plaintiffs Greg Jones and Darlene Jones incurred medical expenses, funeral expenses, and burial expenses.

61. Plaintiffs Greg Jones and Darlene Jones have been personally devastated by the loss of their son, Eric Jones. Among other things, they have suffered a loss of companionship, loss of care, loss of support, and loss of society.

WHEREFORE, Plaintiffs pray for the following relief:


1. Compensatory and general damages in the amount of at least \$20,000,000;
2. Punitive and exemplary damages in an amount necessary to punish and deter the defendants' conduct;
3. Costs of suit and reasonable attorneys' fees pursuant to 42 U.S.C. § 1988;
4. Such other relief as the Court may deem proper.

DATED: July 2, 2008

ERIC R. MAIER
LOUIS E. SHOCH
MAIER SHOCH LLP

BRIAN E. CLAYPOOL
THE CLAYPOOL LAW FIRM

By: _____


Eric R. Maier

Attorneys for Plaintiffs
GREGORY JONES and DARLENE JONES

DEMAND FOR TRIAL JURY

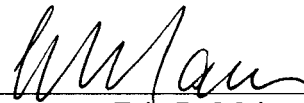
Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs hereby demand a jury trial of all claims against Defendants.

DATED: July 2, 2008

ERIC R. MAIER
LOUIS E. SHOCH
MAIER SHOCH LLP

BRIAN E. CLAYPOOL
THE CLAYPOOL LAW FIRM

By: _____



Eric R. Maier

Attorneys for Plaintiffs
GREGORY JONES and DARLENE JONES